

STRADLEY, RONON, STEVENS & YOUNG, LLP
A Pennsylvania Limited Liability Partnership
By: Francis X. Manning
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Attorneys for Defendant
Chase Home Finance LLC

UNITED STATES COURT DISTRICT
FOR THE DISTRICT OF NEW JERSEY
(CAMDEN VICINAGE)

STACEY COLEMAN, fka Stacey Kovilaritch: individually and as a class representative on behalf of others similarly situated,

Plaintiff,

VS.

CHASE HOME FINANCE, LLC,
successor-by-merger to CHASE
MANHATTAN MORTGAGE
CORP. and John Doe 1-100 and John
Doe Servicers 1-1-100,

Defendant.

No. 1:08-cv-02215-NLH-JS

NOTICE OF RULE 12(b)(1)
AND (6) MOTION TO DISMISS
PLAINTIFF'S FIRST
AMENDED COMPLAINT

FILED ELECTRONICALLY
Return Date: August 3, 2009

TO: Lewis G. Adler, Esquire
26 Newton Avenue
Woodbury, NJ 08096

PLEASE TAKE NOTICE that on August 3, 2009, at 9:00 in the forenoon or as soon thereafter as counsel may be heard, defendant Chase Home Finance LLC, through its attorneys, will move before this Court at the Mitchell H. Cohen U.S. Courthouse, 1 John F. Gerry Plaza, Camden, New Jersey 08101, pursuant to Federal Rule of Civil Procedure 12(b)(1) and (6) and the Local Rules of the U.S. District Court for the District of New Jersey, for an Order dismissing the First Amended Complaint in its entirety, with prejudice.

In support thereof, Defendant relies on and incorporates herein by reference the accompanying Brief and Declaration of Francis X. Manning. A proposed form of Order also is enclosed.

Oral argument is requested if the motion is opposed.

Respectfully submitted,

/s/ Francis X. Manning

Francis X. Manning

Andrew K. Stutzman

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& YOUNG, LLP

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